

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

AT CHARLESTON

UNITED STATES OF AMERICA,

v.

Case No. 2:20-cr-00054

NEDELTCHO VLADIMIROV,

Defendant.

**DEFENDANT’S MOTION FOR ADDITIONAL EXTENSION OF TIME TO FILE
RULE 33 MOTION FOR NEW TRIAL AND OTHER POST-TRIAL MOTIONS**

Now comes the Defendant, Nedeltcho Vladimirov, by counsel, Timothy J. LaFon, and moves this Honorable Court to Extend the present deadline of August 30, 2021, to file Post-Trial Motions, including Rule 33 Motions to September 13, 2021. In support thereof, the Defendant states as follows:

1. The Defendant’s counsel is currently preparing for a Federal criminal trial in the matter of United States of America v. James Woods, Jr. Case No. 20-cr-00001 which is currently set for trial on September 7, 2021.

2. Sentencing in this matter is not set until November 18, 2021, therefore an additional extension of two (2) weeks would not prejudice any party in this matter.

THEREFORE, the Defendant moves this Honorable Court to extend by an additional two (2) weeks to September 13, 2021, the deadline to file Post-Trial Motions, including Rule 33 Motion for New Trial and for such other and further relief as this Court deems just.

NEDELTCHO VLADIMIROV

By Counsel.

CICCARELLO, DEL GIUDICE & LAFON

By: /s/Timothy J. LaFon

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Phone: (304)344-4440
Attorney for Defendant

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CERTIFICATE OF SERVICE

I, Timothy J. LaFon, do hereby certify that the foregoing **“Defendant’s Motion for Additional Extension of Time to File Rule 33 Motion for New Trial and Other Post-Trial Motions”** has been served upon all parties via the Court’s electronic filing system on the 26th day of August, 2021:

Andrew Tessman, Esquire
United States Attorney’s Office
P.O. Box 1713
Charleston, West Virginia 25326

CICCARELLO, DEL GIUDICE & LAFON

By: /s/Timothy J. LaFon
Timothy J. LaFon (#2123)
Attorney for Defendant